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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 DANIEL WAKEMAN,
14 Defendant.

Case No. 2:16-CR-092-APG-VCF

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Second Request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
17 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Rebecca Levy,
19 Assistant Federal Public Defender, counsel for DANIEL WAKEMAN, that the Revocation
20 Hearing currently scheduled on Wednesday, January 18, 2017 at 9:30 a.m. be vacated and
21 continued to a date and time convenient to the Court, but no earlier than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant has been indicted on the gun charges, which form the basis for the
24 petition for revocation. The current trial date is set for February 7, 2017.
25 2. The defendant is in custody, but does not oppose the continuance.
26

1 3. Defense counsel will need additional time within which to review the discovery
2 on the underlying allegations of this revocation in order to properly prepare for the revocation
3 hearing in this matter.

4 4. The parties agree to the continuance.

5 5. The parties are discussing the possibility of a global resolution for both cases.

6 6. Appellate counsel for the defendant has requested permission from the 9th
7 Circuit Court to file a 2255 on the Johnson issue.

8 This is the second request for a continuance of the revocation hearing.

9 DATED this 12th day of January, 2017.

10
11 RENE L. VALLADARES
12 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

13 /s/ Rebecca Levy
14 By _____
15 REBECCA LEVY
16 Assistant Federal Public Defender

/s/ Robert Knief
By _____
ROBERT KNIEF
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 DANIEL WAKEMAN,

7 Defendant.

Case No. 2:16-CR-092-APG

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Wednesday, January 18, 2017 at 9:30 a.m.,
12 be vacated and continued to March 21, 2017 at the hour of 10:30 a.m. in Courtroom 6C.

13 DATED this 12th of January, 2017.

14 

15 _____
16 UNITED STATES DISTRICT JUDGE